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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAPHAEL A. SANCHEZ,

Defendant.

NO. 18-CR-

0040 RSL

INFORMATION

Count One: 18 U.S.C. § 1343

(Wire Fraud)

Count Two: 18 U.S.C. § 1028A

(Aggravated Identity Theft)

The United States of America, by and through the United States Department of Justice,
Criminal Division, Public Integrity Section, charges that:

COUNT ONE

Wire Fraud

(Title 18, United States Code, Section 1343)

Beginning in or about October, 2013, and continuing until on or about October 25, 2017,
in the Western District of Washington, the defendant,

RAPHAEL A. SANCHEZ,

devised and intended to devise a scheme and artifice to defraud financial institutions, including
American Express Company, Bank of America Corporation, Capital One Financial Corporation,
Citibank, Discover Financial Services, and JPMorgan Chase & Co., by using the personally
identifying information of seven aliens in various stages of immigration proceedings with the
United States Immigrations and Customs Enforcement to obtain money and property by means of

materially false and fraudulent pretenses, representations, and promises, and in doing so, transmitted and caused to be transmitted by means of wire communications in interstate or foreign commerce, writings, signals, and email communications for the purpose of executing such scheme and artifice to defraud; including but not limited to the following email that SANCHEZ caused to be sent via interstate wires:

DATE OF WIRE	DESCRIPTION OF WIRE COMMUNICATION
April 18, 2016	Email message sent from Raphael.Sanchez@ice.dhs.gov to Raphael.Sanchez@ice.dhs.gov and Raphael_sanchez@yahoo.com, containing a Puget Sound Energy bill addressed to R.H. for service at 3516 South Webster Street #A, Seattle, Washington, and an image of a United States permanent resident card and the biographical page of a Chinese passport issued to R.H., originating in Washington and utilizing email servers in West Virginia and Mississippi

All in violation of Title 18, United States Code, Section 1343.

COUNT TWO

Aggravated Identity Theft

(Title 18, United States Code, Section 1028A)

On or about July 5, 2016, in the Western District of Washington, the defendant,

RAPHAEL A. SANCHEZ,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, including the name, Social Security number, and birth date of R.H., a real person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, wire fraud in violation of 18 U.S.C. § 1343, as charged in Count One of this Information, in violation of 18 U.S.C. § 1028A(a)(1).

Respectfully submitted,

ANNALOU TIROL
ACTING CHIEF
PUBLIC INTEGRITY SECTION



Luke Cass



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Trial Attorneys
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